

STAFF REPORT
CEASE AND DESIST ORDER
FOR
WESTWOOD COMMUNITY SERVICES DISTRICT
WASTEWATER TREATMENT PLANT
LASSEN COUNTY

Introduction

The Westwood Community Services District, hereafter Discharger, operates a wastewater treatment plant (Plant) consisting of a collection system and facultative ponds. The ponds are southwest of the Town of Westwood, in Lassen County. Average dry weather design capacity of the Plant is 0.3 million gallons per day. The Plant is regulated by Waste Discharge Requirements (WDRs) Order No. 5-01-253.

A headworks, (bar screen and Parshall flume), and five ponds make up the Plant. The original wastewater collection system was built in the early 1900s, as part of the construction of the lumber town of Westwood. Much of the piping consisted of clay, and by the 1960's there were significant Infiltration and Inflow (I/I) problems in the collection system. During the last 40 years, many upgrades to the collection system have been performed. In 1998, Westwood received a Community Development Block Grant and Farmers Home Administration loan to upgrade the remainder of the collection system, including several pump stations.

Compliance History

The Discharger has experienced inadequate pond freeboard on numerous occasions over the last several years. In addition, self monitoring reports from April and May of 2003, as well as March, April, and May of 2004 revealed inadequate freeboard at the Discharger's disposal ponds.

On 14 April 2005, the Discharger notified Central Valley Regional Water Quality Control Board (Regional Board) staff that they were suffering from inadequate freeboard and were in danger of discharging from the ponds. A site visit by Regional Board staff on 19 April 2005 confirmed the inadequate freeboard, as well as a recent minor discharge from the ponds. In the summer of 2005 the Discharger brought in fill and raised the level of the pond berms approximately 18 inches to correct the freeboard problem.

On 28 February 2006, the Discharger notified Regional Board staff of inadequate freeboard and noted the ponds were again in danger of discharging. Precipitation in the area diminished thereafter and prevented a discharge from the ponds at that time. However, Regional Board staff was again notified by the Discharger of freeboard problems and the potential for pond overflow in late March of 2006.

Regional Board staff inspection on 27 March 2006 verified the absence of freeboard, as well as a discharge of approximately 100 gallons per minute from the ponds toward the Union Pacific railroad tracks to the southeast. The area to which the wastewater was discharged is

bounded on the north by the Discharger's ponds, on the southwest by an existing berm, and on the southeast by the Union Pacific railroad tracks, which are elevated above natural grade by approximately 6 feet. No discharge to the Mountain Meadows Reservoir was observed during this inspection, but leakage of wastewater through the railroad bed to the reservoir may have occurred.

The 2005/2006 rainfall season was one of above average precipitation, including a higher ratio of rain to snow than is normal for the area. In spite of these conditions, the ponds should have accommodated wastewater and I/I if the collection system was functioning adequately.

Conversations with the Discharger during the inspection revealed that one of the lift stations in the wastewater collection system had been running continuously prior to the discharge. Regional Board staff also observed that a portion of the Town was suffering from shallow saturated soil conditions, a condition bound to worsen I/I problems.

The Discharger has recently begun implementing a rudimentary I/I reduction program. The Discharger has discovered a six inch abandoned line discharging to the collection system that is no longer connected to any residences. The six-inch line was apparently collecting large quantities of groundwater and discharging it to the sewer; the line has subsequently been plugged. In addition, the Discharger has begun a program of manhole sealing, as well as televising parts of the collection system. The District identified 10 manholes of particular concern during March and April 2006.

Proposed Cease and Desist Order

The proposed Cease and Desist Order requires submittal of a technical report by **30 April 2008**. The report must identify the specific I/I problem areas within the collection system and recommended corrective actions to reduce excessive I/I, along with a time schedule for implementation of those actions. Additionally, the Discharger must determine whether their influent flow meter is operating adequately and whether flows of wastewater from the adjacent Ultra-Power cogeneration facility are excessive. If those analyses are inconclusive regarding the inadequate freeboard, the Discharger must investigate whether groundwater may be entering the ponds because of the adjacent high water table, and provide a report on this investigation by **30 June 2008**. The Order also requires quarterly progress submittals due on 15 April, 15 July, 15 October, and 15 January, beginning **15 July 2008**. The progress submittals must summarize actions taken to reduce I/I and the estimated reduction of I/I achieved from those actions.

Recommendation

Regional Board staff recommends the adoption of the Cease and Desist Order.